

EXHIBIT A

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT
BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

[PROPOSED] ORDER GRANTING MOTION OF ASSURED GUARANTY CORP. AND ASSURED GUARANTY MUNICIPAL CORP. FOR (I) RELIEF FROM THE STAY IMPOSED BY THE *FINAL ORDER REGARDING (A) STAY PERIOD, (B) MANDATORY MEDIATION, AND (C) CERTAIN DEADLINES RELATED THERETO* (ECF NO. 12189), OR, IN THE ALTERNATIVE, (II) RECONSIDERATION, PURSUANT TO FED. R. CIV. P. 59, OF THE *FINAL ORDER REGARDING (A) STAY PERIOD, (B) MANDATORY MEDIATION, AND (C) CERTAIN DEADLINES RELATED THERETO* (ECF NO. 12189)

Upon the *Motion of Assured Guaranty Corp. and Assured Guaranty Municipal Corp. for (I) Relief from the Stay Imposed by the Final Order Regarding (A) Stay Period, (B) Mandatory Mediation and (C) Certain Deadlines Related Thereto (ECF No. 12189), Or, In The Alternative, (II) Reconsideration, Pursuant to Fed. R. Civ. P. 59, Of The Final Order Regarding (A) Stay Period, (B) Mandatory Mediation, And (C) Certain Deadlines Related Thereto (ECF No. 12189)*

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19 BK 5523-LTS) (Last Four Digits of Federal Tax ID: 3801). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

(the “Motion”);² and the Court having found and determined that (i) the Court has jurisdiction to consider the Motion and the relief requested therein pursuant to section 306 of PROMESA; (ii) venue is proper before this Court pursuant to section 307(a) of PROMESA; (iii) due and proper notice of the Motion has been provided under the particular circumstances and no other or further notice need be provided; (iv) any objections to the relief requested in the Motion having been withdrawn or overruled; and (v) after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth herein.
2. Assured is granted relief from the Stay Order. The GO Claim Objection will proceed, whereby oppositions to the GO Motions to Dismiss (ECF Nos. 10702 and 10704) will be due by [], and Assured’s reply will be due by []. The hearing on the GO Motions to Dismiss will be held on April 30, 2020, at 10:00 a.m. (Atlantic Standard Time) in New York, with video connection to San Juan.
3. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.
4. The Movants are authorized to take all actions necessary to effectuate the relief granted pursuant to this Order.
5. This Court retains jurisdiction over any disputes relating to the interpretation or implementation of this Order.

Dated: _____, 2020

HONORABLE LAURA TAYLOR SWAIN
UNITED STATES DISTRICT JUDGE

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Motion.